



**PUBLIC SERVICES DEPARTMENT**  
**HARRISON STREET FACILITY**

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October 13, 2015

Mr. Michael Berkoff, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 5, SR-6J  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

Re: Operable Unit 1, Allied Paper/Portage Creek/Kalamazoo River Superfund Site

Dear Mr. Berkoff:

At your request, the City of Kalamazoo, Department of Public Services is submitting this letter to articulate our current position with regard to EPA's groundwater conceptual site model at the Allied site (OU-1). With the data generated from the fourth quarter 2014 site activities, the City of Kalamazoo concludes that there is adequate site groundwater information to move forward in the Superfund process.

When coupled with the data from the 2008 Remedial Investigation, the additional 2014 groundwater data indicates that the shallow water bearing formation, which is vertically closest to the contamination resident on the site, has an upward vertical gradient that discharges to Portage Creek that, more or less, forms the east boundary of the OU-1. The same conclusion applies to the intermediate water bearing formation that lies beneath the shallow. This recent study supports the Remedial Investigation (RI) Site Conceptual Model that concluded that there was no hydrogeological pathway from OU-1 to the City's wellfields. Therefore, the risk of contamination of the City of Kalamazoo wellfields from OU-1 has been greatly diminished.

Potential implementation of EPA's recommended alternative 2D will allow the contaminated material to remain onsite. With that, it is understood that the remedial design must include a comprehensive long term groundwater monitoring system to assure that the selected remedy remains protective of human health and the environment. In so far as EPA and MDEQ has assured that the City will be a participant in future site activities, we anticipate having input in the design of the OU-1 groundwater monitoring system as well as receiving the future groundwater monitoring data that will be a part of the anticipated long term environmental monitoring plan for the site. Additionally, the monitoring results also indicated that PCBs are not migrating from the site.

In conclusion, the City of Kalamazoo appreciates the opportunity to participate in discussions with the EPA and MDEQ over the past several years as this operable unit has progressed through the Superfund process. We look forward to continuing our involvement in this manner as the remediation moves into its subsequent phases of the remedial design and remedial action. In essence, the OU-1 groundwater monitoring system, as well as other groundwater data monitored outside of the OU-1 boundary, will likely be a key element to the City's wellhead protection program strategy.

Sincerely,



Sue Founé  
Public Services Managing Director

c: Kalamazoo River Cleanup Coalition;  
Kalamazoo River Watershed Council

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